

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO. <u>10-</u>
v.	: DATE FILED:_____
MICHAEL KUSHNER	: VIOLATIONS:
	: 18 U.S.C. § 2252(a)(2) (distribution of child pornography - 1 count)
	: 18 U.S.C. § 2252(a)(4) (possession of child pornography - 1 count)
	: Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about May 27, 2009, in Langhorne, Bucks County, in the Eastern District of Pennsylvania, and elsewhere, defendant

MICHAEL KUSHNER

knowingly distributed visual depictions that had been shipped in interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2009, in Langhorne, Bucks County, in the Eastern District of Pennsylvania, defendant

MICHAEL KUSHNER

knowingly possessed computer hard drives which contained more than 600 visual depictions that had been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2252(a)(2) and (4), set forth in this indictment, defendant

MICHAEL KUSHNER

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2252(a)(2) and (4), as charged in this indictment, including, but not limited to:

1. One HP Media Center m370n, serial number MXK33823R8;
2. One HP Pavillion m7580n, serial number MXF6260BZM ;
3. One Western Digital USB hard drive, serial number WMAL92751729; and
4. Dell Inspiron laptop computer, serial number 8R3J2B1.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney